

ALEX G. TSE (CABN 152348)
Acting United States Attorney

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 3:17-CR-180 RS
)	
Plaintiff,)	STIPULATION AND
)	PROPOSED ORDER EXCLUDING TIME
v.)	UNDER THE SPEEDY TRIAL ACT
)	
APRIL MYRES, and)	
ANTOINE FOWLER,)	
)	
Defendants.)	


The parties appeared before the Court for a status conference on June 26, 2018. The parties, with the consent of the defendants, hereby stipulate as follows:

1. The United States has provided the defendants with discovery materials, and the defendants require additional time to review the discovery and to prepare effectively.
2. There is good cause to exclude time under the Speedy Trial Act as the ends of justice from such an exclusion outweigh the best interest of the public and the defendants in a speedy trial. Specifically, such an exclusion provides the respective defense counsel reasonable time for effective preparation, taking into account due diligence. 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

3. Based on the foregoing, the parties jointly and respectfully request that the Court issue the proposed order excluding time under the Speedy Trial Act.

IT IS SO STIPULATED.

DATED: June 26, 2018


TONY TAMBURELLO
Counsel for Defendant Myres

DATED: June 26, 2018


KENNETH HOWARD WINE
Counsel for Defendant Fowler

ALEX G. TSE
Acting United States Attorney

DATED: June 26, 2018

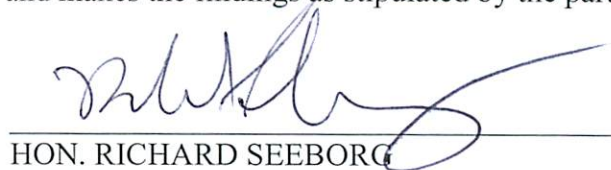

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[PROPOSED] ORDER TO EXCLUDE TIME

Based on the stipulation of the parties, the consent of the defendants, and on good cause shown, the Court orders that the time period from the date of this Order, through and including the date set for the hearing before the District Court on October 23, 2018, is excluded under the Speedy Trial Act. The Court bases this exclusion of time and makes the findings as stipulated by the parties above.

IT IS SO ORDERED.

Dated: 6/26/, 2018


HON. RICHARD SEEBORG
United States District Judge